

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

In re: JAMISON DYER	§	Case: 24-80163-G-13
	§	
Debtor	§	Chapter 13

RESPONSE TO TRUSTEE’S AMENDED MOTION TO DISMISS

Jamison Dyer, Debtor, files this Response to the Chapter 13 Trustee’s Amended Motion to Dismiss:

1. Debtor desires to continue with the chapter 13 plan.
2. Debtor’s counsel has filed a proposed order for EFT.
3. Debtor has filed his federal income tax returns for the 2015-2020 tax years. Debtor’s counsel has provided a signed copy to the Internal Revenue Service.
4. Debtor is working to complete the 2021 and 2023 tax returns. Should be filed prior to the Friday, August 23, 2024, hearing.
5. Debtor’s counsel has filed an Amended Chapter 13 Plan.
6. Debtor’s counsel has provided the chapter 13 trustee with proof of income.
7. Debtors desire a hearing on the Motion to Dismiss.

WHEREFORE, Debtors request that this court conduct a hearing, not dismiss the chapter 13 case, and for such other and further relief to which Debtors may be justly entitled.

Dated: August 21, 2024

Respectfully submitted,

/s/Reese W. Baker
Reese W. Baker
Texas Bar No. 01587700
Sonya Kapp
TX Bar No. 11095395
Nikie Marie Lopez-Pagan
TX Bar No. 24090233
Baker & Associates
950 Echo Lane, Suite 300

Houston, Texas 77024
713-869-9200
713-869-9100 (fax)
ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on August 21, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/Reese W. Baker
Reese W. Baker